

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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IN RE: TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

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) **Civil Action No. 03. MDL 1570 (GBD)**  
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**DEFENDANT WAEL JELAIDAN's 26(a)(1) INITIAL DISCLOSURES**

Defendant Wael Jelaidan ("Jelaidan"), by and through its undersigned counsel, makes the following initial disclosures pursuant to Federal Rules of Civil Procedure 26(a)(1). These initial disclosures are based on information reasonably available to Jelaidan as of the date hereof. The disclosures herein are provided without prejudice to the rights of Jelaidan to identify additional witnesses or evidence. Further, Jelaidan reserves the right to supplement these initial disclosures.

**I. Individuals With Relevant Discoverable Information**

The following individuals are likely to have discoverable information that Jelaidan may use to support its defenses. Jelaidan does not consent to or authorize any communications with its employees, agents, officers, or directors, whether formerly or presently associated or employed by Jelaidan and does not consent to or authorize any other communication prohibited by any applicable rule of professional conduct.

1. **Mr. Marco Rochat**, CEO of Faisal Finance  
Address: 3, Qual du Mont Blanc P.O. Box 1494 -1211 Geneva 1, Switzerland  
Subject: Has knowledge of Mr. Jelaidan's account in Faisal Finance (Switzerland) S.A.
2. **Mr. Alexander Theocharides**, Director of Wealth Management  
Address: 3, Qual du Mont Blanc P.O. Box 1494 -1211 Geneva 1, Switzerland  
Subject: Has knowledge of Mr. Jelaidan's account in Faisal Finance (Switzerland)

S.A.

3. **Mr. Jamal Ahmad Khashoggi**, Saudi Political Analyst and Deputy Editor in Chief for the English-Language Arab News  
Address: Jeddah, Saudi Arabia  
Subject: Relative and friend of Mr. Jelaidan and wrote article about him in the Daily Star
4. **Mr. Badr Almotawa**, Arab New Staff  
Address: Jeddah, Saudi Arabia  
Subject: Wrote article about Mr. Jelaidan's humanitarian activities on arabnews.com
5. **Faculty for Soil Science courses at Eastern Kentucky University from 1979-1981**  
Address: 521 Lancaster Avenue, Richmond, Kentucky 40475  
Subject: Mr. Jelaidan's undergraduate years in Easter Kentucky
6. **Faculty for Range Management courses at University of Arizona, Tucson from 1983-1985**  
Address: The University of Arizona, Tucson, AZ 85721  
Subject: Nr. Jelaidan's graduate years in Tucson, AZ
7. **Rabita Trust Board**  
Contact Information: Can be reached through counsel
  - a. **General Parvez Musharaff**, Chairman
  - b. **H.R.H Prince Talal bin Abdul Aziz Al-Saud**, Co-Chairman
  - c. **H.E. Abdullah bin Saleh Al-Obaid**, Co-Chairman
  - d. **Mr. Shaukat Aziz**, Vice Chairman
  - e. **Lt. Gen Moin-ud Din Halder**, Member
  - f. **Lt. Gen Muhammad Safdar**, Member
  - g. **Air Marshal Azim Daud Pota**, Member
  - h. **H.E. Yousef Jasim Al-Hill**, Member
  - i. **H.E. Dr. Adnan Khalil Basha**, Member
  - j. **H.E. Dr. Abdul Malik Al-Hamar**, Member

- k. **H.E. Al-Sheik Hamad A;-Zamil**, Member
- l. **Engineer Abdul Moshin Al-Idris**, Member
- m. **Mr. Majid Nizani**, Member

## **II. Categories and Location of Relevant Documents**

Pursuant to Federal Rule of Civil Procedure 26(a)(1)(A)(ii), Jelaidan provides the following description, by category and location, of all documents electronically stored information, and tangible things in possession, custody, or control that he may use to support his defenses.

- 1. **Documents related to Jelaidan's banking accounts, financial statements, balance sheets, income statements, and annual reports\***
- 2. **Documents relating to projects undertaken and financed by Jelaidan\***
- 3. **Correspondence from W. Jelaidan to Martin F. McMahon re: Auditors Report re: Rabita Trust, September 14, 2005\***
- 4. **Correspondence from W. Jelaidan to Dr. Abdullah bin Abdul Mohsin Al-Turki, Secretary General, Rabita al Alam al Islami, March 24, 2005\***
- 5. **Bank Records, Faisal Finance, January 2005\***
- 6. **Correspondence from Syed Ehsonul Hague to His Excellency Mr. Shaukat Aziz, (Prime Minister of Pakistan) Sept. 6, 2004 \***
- 7. **Affidavit, W. Jelaidan, March 3, 2004\***
- 8. **Affidavit, W. Jelaidan on behalf of Rabita Trust, March 3, 2004\***
- 9. **Correspondence from Javed Masud, Government of Pakistan, Cabinet Division. Dr. Abdullah bin Abdul Moshin Al-Turki, Secretary General, Rabitaal Alam Islami (w/o encl.), December 16, 2002\***
- 10. **Correspondence from Rahmal Uhah Nazir Khan, Project Director to the Cabinet Secretary for the Government of Pakistan, October 5, 2002\***

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\* These documents have already been produced to 9/11 lawyers

11. **Commentary, *The Daily Star* , [Jamal Khashoggi]. “Where Islam is concerned the world has become color-blind,” September 17, 2002\***
12. **Article, *Arab News*, “US urged against sound-proof in Julaidan’s case” [Badr Al-Motawa] (Sept. 8, 2002) \***
13. **Article, *Arab News*, "Steven Emerson out to Wreck Arab-US ties" [Jamal Khashoggi] (10/17/2001) \***
14. **Statement from W. Jelaidan, Secretary General Rabita Trust dated October 15, 2001\***
15. **Circular, Muhammed Riaz Malik, Solicitation Officer for Rabita Trust, "Composition of Rabita Trust Board."March 14, 2000 \***
16. **Deed, The Rabita Trust, July 9, 1988\***
17. **Audit reports for Rabita Trust, Aslim Khan & Co., Chartered Accountants\***
19. **Correspondence from W. Jelaidan, Secretary General Rabita Trust, undated, Summary of Events After 11, September, 2001 and Report on Latest Events Related to Repatriation of the Stranded Pakistanis\***
23. **Transcribed correspondence from Dr. Abdullah bin Abdul Moshin Al-Turki, Secretary General, Rabita al Alam Islami to His Excellency Abdul Aziz Mirza, the Ambassador of Pakistan in the Kingdom of Saudi Arabia \***
24. **Statement of life in America by Mr. Jelaidan\***

All of the aforesaid documents are located in the following addresses:

- **Martin McMahon & Associates  
1150 Connecticut Ave., N.W., Suite 900  
Washington, D.C. 20036**
- **Any and all other aforesaid documents will be available for inspection in Mecca or Jeddah, Saudi Arabia**

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### **III. Computation of Damages**

Jelaidan has not asserted a claim for damages against any other party in this action.

### **IV. Insurance**

At the present time, Jelaidan is unaware of any insurance agreement under which an insurance business may be liable to satisfy all or part of a judgment that may be entered in this action, or to indemnify or reimburse payments made to satisfy such a judgment.

Respectfully Submitted,

MARTIN F. MCMAHON & ASSOCIATES

/s/ Martin F. McMahon, Esq.

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